

March 17, 2003

Mr. Richard Berkemeier
Tobin Tool and Design Company, LLC
1004 W. Washington St.
Shelbyville, Indiana 46176

Re: 145-16682
First Significant Permit Revision to
MSOP 145-12108-00029

Dear Mr. Berkemeier:

Tobin Tool and Design Company, LLC, was issued a MSOP on November 16, 2000, for a stationary hard chromium electroplating manufacturing facility. A letter requesting the Office of Air Quality of permit condition changes was received on January 16, 2003. The requested changes do not meet the definition of notice only change or minor permit revision as described in 326 IAC 2-6.1-6(d) and (g) respectively. Therefore, pursuant to the provisions of 326 IAC 2-6.1-6(i), a significant permit revision is granted as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section C.15 is revised as follows:

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b a)~~ The report required in ~~(a)~~ of this condition and Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air **Quality Management**
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~(b e)~~ Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, **OAQ OAM**, on or before the date it is due.

~~(d c)~~ Unless otherwise specified in this permit, any ~~quarterly~~ report **required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326

~~(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) A malfunction as described in 326 IAC 1-6-2; or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g d)~~ The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - Shelby County
U.S. EPA, Region V
Shelby County Health Department
Air Compliance Section Inspector - D. J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Tobin Tool & Design Co., LLC
1004 W. Washington St.,
Shelbyville, Indiana 46176**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 145-12108-00029	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 16, 2000 Expiration Date: November 16, 2005

1 st Significant Permit Revision: 145-16682 Pages Modified: 13, 14	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 17, 2003

- (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the

year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

Tobin Tool and Design Co., LLC
Shelbyville, Indiana
Permit Reviewer: AY/EVP

1st Sig. Permit Revision: 145-16682
Changed By: Madhurima D. Moulik

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- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit

Source Background and Description

Source Name:	Tobin Tool and Design Company, LLC
Source Location:	1004 W. Washington Street, Shelbyville, IN 46176
County:	Shelby
SIC Code:	3471
Operation Permit No.:	145-12108-00029
Operation Permit Issuance Date:	November 16, 2000
Permit Modification No.:	146-16682
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from Tobin Tool and Design Company, LLC relating to the operation of a stationary hard chromium electroplating manufacturing facility.

Explanation of Modification

The source requested that the permit condition regarding the submission of a quarterly monitoring report be removed, along with changes to other related conditions. As such, Condition C.15 is modified to delete the requirement for a quarterly report, which is consistent with current compliance guidelines which do not require quarterly reports for sources operating under an MSOP.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Revision. The requested changes do not qualify for an administrative amendment under 326 IAC 2-6.1-6(d) or minor permit revision under 326 IAC 2-6.1-6(g). Therefore, this modification is being performed pursuant to 326 IAC 2-6.1-6(i), which states that a significant permit revision can be used for "those changes that are not subject to subsection (d) or (g)".

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 16, 2003.

Conclusion

This permit modification shall be subject to the conditions of the attached MSOP Significant Permit

Source Name
Location, Indiana
Permit Reviewer: (**Reviewer Name**)

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Revision No. 145-16682-00029.